

**Amendment to the Drawings:**

*The attached Replacement Sheets of drawings include changes to FIGs. 1-5.*

In FIGs. 1 – 5, appropriate labels and descriptions for the elements of the respective figures have been added, as described in the specification and as disclosed in priority document US 60/537,808, filed January 20, 2004. In addition, a reference numeral 542 has been added to FIG. 5D to indicate the hypernym tree that is illustrated on the left-hand side of the figure.

Attachment: Replacement Sheets  
Annotated Sheets Showing Changes

## **REMARKS**

By this amendment, claims 2, 4, 9-13, 15, 17 and 20-26 have been canceled. In addition, claims 1, 3, 6-8, 14 and 19, the specification, and the drawings have been amended. Claims 1, 3, 5-8, 14, 16 and 18-19 remain in the application. This application has been carefully considered in connection with the Examiner's Action. Reconsideration, and allowance of the application, as amended, is requested.

### **Objection to the Specification**

The abstract of the disclosure stands objected to as not having been submitted on its own sheet of paper without the rest of the WO information. By this amendment, the abstract has been amended and presented on its own sheet of paper.

The disclosure stands objected to because of the following informalities:

Statements regarding "hypernym tree(s)" and "hyponym tree(s)" on page 9, paragraph 3 and page 10, paragraph 2 were cited as lacking clearly/specifically definitions/descriptions to distinguish the difference(s) between the recited two types of trees. As now presented, the specification has been amended on pages 9 and 10 to clarify said respective terms. Support for the amendment to the specification can be reasonably inferred from the content of the specification as originally filed, and as disclosed in the figures of the priority document. Accordingly, no new matter has been introduced.

The meaning of the statement "For each of the hyponym trees, the number of words that are common to the hyponym tree and the set of keywords are counted (step 470)" was cited as being unclear. As now presented, the specification has been amended on page 10 to clarify said statement, in particular, more accurately using the term "wordstems" in place of the term "keywords." Support for the amendment to the specification can be reasonably inferred from the content of the specification as originally filed, and as disclosed in the figures of the priority document. See for example, the specification on page 11, line 29 through page 12, line 8. Accordingly, no new

matter has been introduced.

The recited/referenced contents of “sentence”, “keywords”, “wordstems”, “pairs of trees listed in the first two fields”, and “the hyponym trees of level-5 parents” were cited as not being shown on the corresponding figures. As presented herein, the drawing figures have been amended to include the appropriate labels and descriptions, as supported by the specification and corresponding figures of the priority document. Accordingly, no new matter has been introduced.

Accordingly, the objection to the specification has been overcome.

### **The Drawings**

The drawings stand objected to because the drawings failed to show proper legends (or textural labels) for each of the functional blocks or reference numbers. Applicant notes the objection to the drawings and has amended Figures 1-5, as presented herein, to include appropriate legends and descriptive labels for each of the elements of respective figures. Support for the amendment to the drawings can be found in the specification; and further as disclosed in the figures of priority document US 60/537,808, filed January 20, 2004. Accordingly, the objection of the drawings has now been overcome. Withdrawal of the objection is requested.

### **Rejection under 35 U.S.C. §101**

Claims 1-8 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. With respect to claims 2 and 4, the same have been canceled herein, thus rendering the rejection thereof now moot. With respect to claim 1, this rejection is respectfully traversed for at least the following reasons. Claim 1 has been amended to more clearly recite a method for providing content to a conversation between at least two people via an expert system comprising, in part, extracting, via a keyword extractor, one or more keywords; determining, via the keyword extractor, a set of wordstems; determining, via a topic finder, a topic of said conversation; obtaining, via

a content finder, content based on said extracted keywords; and presenting, via a content presentation system, said content. Accordingly, the rejection of claim 1 is now believed overcome. Claims 3 and 5-8 depend from claim 1 and thus the rejection of claims 3 and 5-8 is also believed overcome. Withdrawal of the rejection is respectfully requested.

### **Rejection under 35 U.S.C. §112**

Claims 2-4 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. This rejection is respectfully traversed for at least the following reasons. With respect to claims 2 and 4, the same have been canceled herein, thus rendering the rejection thereof now moot. With respect to claim 3, as presented herein, claim 3 has been amended to provide proper antecedent basis for each limitation of the claim. Accordingly, the rejection of claim 3 is now believed overcome. Withdrawal of the rejection is respectfully requested.

### **Rejection under 35 U.S.C. §102**

#### **Claim 1:**

Claim 1 recites a method for providing content to a conversation between at least two people via an expert system that includes at least a processor and a memory, the method comprising:

- extracting, via a keyword extractor, one or more keywords from said conversation;

- determining, via the keyword extractor, a set of wordstems of said extracted keywords;

- determining, via a topic finder, a topic of said conversation based on said set of wordstems of said extracted keywords, wherein further the topic is determined based on specific-level parents for pairs of hypernym trees whose corresponding

hyponym trees (i) contain a word count of more than two words of the wordstem set and (ii) have a highest coverage, wherein coverage is equal to a ratio of (a) the word count of a respective hyponym tree to (b) the number of words in the set of wordstems, further wherein the hypernym trees are determined for all senses of all words in the wordstem set and the hyponym trees are determined for all senses of the specific-level parents;

obtaining, via a content finder, content based on said extracted keywords, wherein said obtaining content is further based on said topic; and

presenting, via a content presentation system, said content to one or more of said people in said conversation.

Support for the amendments to claim 1 can be found in the specification at least on page 9, line 17 through page 10, line 21; page 11, line 15 through page 12, line 8; and Figs. 4 and 5A-5F.

Claims 1-3, 5-8, 14-16 and 18-19 were rejected under 35 U.S.C. 102(e) as being anticipated by SCAHILL (US 7,542,902; hereinafter "**Scahill**"). With respect to claim 1, Applicant respectfully traverses this rejection for at least the following reasons.

The PTO provides in MPEP § 2131 that

*"[t]o anticipate a claim, the reference must teach every element of the claim...."*

Therefore, with respect to claim 1, to sustain this rejection the **Scahill** reference must contain all of the above claimed elements of the respective claims. However, contrary to the examiner's position that all elements are disclosed in the **Scahill** reference, the reference does not disclose a method that includes "determining ... a set of wordstems of ... extracted keywords; determining ... a *topic ... based on* said set of wordstems ... *further ... based on specific-level parents* for pairs of *hypernym trees* whose corresponding *hyponym trees* (i) contain a *word count* of more than two words of

the wordstem set and (ii) have a *highest coverage*, wherein coverage is equal to a ratio of (a) the word count of a respective hyponym tree to (b) the number of words in the set of wordstems, ... wherein the *hypernym trees* are determined for all senses of all words in the wordstem set and the *hyponym trees* are determined for all senses of the specific-level parents; [and] obtaining ... content ... based on said *topic*" (emphasis added) as is claimed in claim 1. Therefore, the rejection is not supported by the **Scahill** reference and should be withdrawn.

Accordingly, claim 1 is allowable and an early formal notice thereof is requested. Claims 3 and 5-8 depend from and further limit allowable independent claim 1 and therefore are allowable as well. The 35 U.S.C. §102(e) rejection thereof has now been overcome.

Claim 14 has been amended in a manner similar to the amendments to claim 1. Accordingly, for similar reasons as stated with respect to overcoming the rejection of claim 1, claim 14 is believed allowable and an early formal notice thereof is requested. Claim 16 and 18-19 depend from and further limit independent claim 14 and therefore are allowable as well. The 35 U.S.C. §102(e) rejection thereof has now been overcome. Withdrawal of the rejection is respectfully requested.

### **Rejection under 35 U.S.C. §103**

Claims 4 and 17 were rejected under 35 U.S.C. 103(a) as being unpatentable over **SCAHILL** in view of HARRISON et al. (US 2003/0069880 A1; hereinafter "**HARRISON**"). By this amendment, claims 4 and 17 have been canceled, thus rendering the rejection thereof now moot.

### **Conclusion**

Except as indicated herein, the claims were not amended in order to address issues of patentability and Applicants respectfully reserve all rights they may have under

the Doctrine of Equivalents. Applicants furthermore reserve their right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or a continuation application.

It is clear from all of the foregoing that independent claims 1 and 14 are in condition for allowance. Claims 3 and 5-8 depend from and further limit claim 1 and therefore are allowable as well. Claims 16 and 18-19 depend from and further limit claim 14 and therefore are allowable as well.

The amendments herein are fully supported by the original specification and drawings; therefore, no new matter is introduced. An early formal notice of allowance of claims 1, 3, 5-8, 14, 16 and 18-19 is requested.

Respectfully submitted,

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ATTACHMENTS

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